

BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE

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T.R.A. DOCKET ROOM

Re: BellSouth's of BellSouth for the)
Establishment of New Performance Assurance) Docket No. 04-00150
Plan)

PETITION TO INTERVENE OF COMPSOUTH

Competitive Carriers of the South, Inc ("CompSouth")¹ petitions the Authority to intervene in the above-captioned proceeding pursuant to T.C.A. § 4-5-310(a).

CompSouth is a coalition of competitive local exchange carriers certified by the Tennessee Regulatory Authority ("TRA"). This proceeding will address, among other things, the terms and conditions under which CompSouth members may operate in Tennessee. Specifically, this proceeding will address performance measures and penalties regarding the wholesale provision of services and network elements to CompSouth members. Therefore, the legal rights, duties, privileges, immunities, or other legal interests of CompSouth's members may be affected or determined by the outcome of this proceeding. Granting this petition will not impair the interests of justice or the orderly and prompt conduct of these proceedings.

CompSouth, therefore, asks that this Petition to Intervene be granted.

Respectfully submitted,

By: 

Henry Walker

Boult, Cummings, Conners & Berry, PLC

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¹ The members of CompSouth include Access Integrated Networks, Inc., MCI, Birch Telecom, Business Telecom, Inc., Covad Communications Company, AT&T, NewSouth Communications Corp., Talk America, Nuvox Communications, Inc., ITC^DeltaCom, Xspedius Communications, Momentum Business Solutions, Network Telephone Corp., KMC Telecom, Z-Tel Communications, Inc., and IDS Telecom LLC.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been forwarded electronically and via U S. Mail, postage prepaid, to.

Guy M. Hicks
BellSouth Telecommunications, Inc.
333 Commerce Street
Suite 2101
Nashville, TN 37201-3300

on this the 5th day of November, 2004.


Henry Walker